

In The United States District Court
For The Southern District Of Illinois
#2134

Keith Allen - #MA1830
Plaintiff,

v.
Wexford Health Sources, Inc., et al.
Defendants.

Case No. 23-CV-3775-DWD

SCANNED at MENARD and E-mailed
10/2/25 by XLO 14 pages
Date Initials No.

"Plaintiff - Keith Allen - MA1830 - "Motion For Leave To Issue Subpoenas"

Plaintiff's, Keith Allen - #MA1830, Motion For Leave to Issue a Fed.R.Civ. P. 45 Third Party Subpoena to Menard Correctional Center, states as follows:

1.) This matter arises from Plaintiff's allegations of improper medical care for a right-hand injury sustained while incarcerated. Plaintiff has placed his medical condition and treatment at issue.

2.) Based on subpoenas and exchanged discovery to date, it is apparent that the specific imaging documentation and records that were later interpreted by the various defendants, Angela Crain, Alisa Dearmond, N. Florence, N. Yousef, and other providers - Glen S. Babich, etc., are in the possession of the Menard Correctional Center, the Illinois Department of Corrections, and the Orthopaedic Institute of Southern Illinois, and must be obtained via rule 45 Subpoenas. These records are essential for evaluating and substantiating plaintiff's claims.

3.) Plaintiff's policy claims against Wexford Health Sources, Inc., will largely depend on the various policies Wexford has in comparison to accepted Medical Standards policies enclosed in specific Wexford Provider's Handbook, IDOC Negotiated Health Services Contract between Wexford and (ACH) and (NECHC) Medical Standards governing Health Care in Correctional Facilities, which are in the possession of Menard Correctional Center and the Illinois Department of Corrections, and Wexford Health Sources, Inc., and must also be obtained via Rule 45 subpoenas. These records are essential for supporting and substantiating plaintiff's claims against Wexford and the various medical staff in this civil suit.

4.) While the court's scheduling and Discovery Order (Doc. 98) does not expressly limited third party discovery, plaintiff seeks leave out of his disadvantaged pro se status and to ensure compliance with Rule 26(b) and proportionality principles.

5.) Plaintiff intends to issue subpoenas limited to Plaintiff's X-ray and other imaging records, Various medical records, medical grievance records of his injury and complaints, Wexford Policy Handbook -

- Medical Standards, IDOC Contract between Wexford, etc., all directly relating to plaintiff's has. injuries and treatment and Wexford's unconstitutional Policies driving his inadequate medical care (August 2021 to Present).

G.) Plaintiff will serve copies of any subpoenas on defendants pursuant to Rule 45(a)(4) and allow time for objections.

Wherefore, Plaintiff, Keith Allen - # M21830, respectfully moves this Honorable Court to enter an order granting leave to issue third-party subpoenas for the medical records as described above, and for any further relief deemed just and proper.

Respectfully Submitted
Keith Allen - #M21830
By: /s/ Keith Allen - M21830

Keith Allen - #M21830
Menard Correctional Center
P.O. Box 1000
Menard, IL 62259

"Certificate of Service"

The undersigned hereby certifies that on September 29, 2025, I filed the foregoing document with the Clerk of the U.S. District Court Southern District of Illinois via E-File through Menard C.C. law library clerk staff by placing it in Menard C.C. institutional mail to be E-Filed to this District Court; United States District Court, 750 Missouri Ave., East St. Louis, Illinois 62201, with 4 Attached Subpoenas, 14 pages total.

/s/ Keith Allen

Addressees: Enclosed 10 Subpoenas for ① IDOC - Menard Correctional Center, Medical Record officer; ② Ortho-edic Institute of Southern Illinois, Medical Records Officer Supervisor; ③ Wexford Health Sources, Inc.; ④ Menard Correctional Center, Litigation Coordinator.



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS
prisoner.esl@ilsd.uscourts.gov

ELECTRONIC FILING COVER SHEET

Please complete this form and include it when submitting any type of document, letter, pleading, etc. to the U.S. District Court for the Southern District of Illinois for review and filing.

Allen, Keith
Name

M21830
ID Number

Please answer questions as thoroughly as possible and circle yes or no where indicated.

1. Is this a new civil rights complaint or habeas corpus petition? Yes or No

If this is a habeas case, please circle the related statute: 28 U.S.C. 2241 or 28 U.S.C. 2254

2. Is this an Amended Complaint or an Amended Habeas Petition? Yes or No

If yes, please list case number: _____

If yes, but you do not know the case number mark here: _____

3. Should this document be filed in a pending case? Yes or No

If yes, please list case number: 23-CV-3775-DWD

If yes, but you do not know the case number mark here: _____

4. Please list the total number of pages being transmitted: 14

5. If multiple documents, please identify each document and the number of pages for each document. For example: Motion to Proceed In Forma Pauperis, 6 pages; Complaint, 28 pages.

Name of Document	Number of Pages
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<u>Subpoena</u>	<u>2</u>
<u>Subpoena</u>	<u>2</u>
<u>Subpoena</u>	<u>2</u>
<u>Subpoena</u>	<u>6</u>

Please note that discovery requests and responses are NOT to be filed, and should be forwarded to the attorney(s) of record. Discovery materials sent to the Court will be returned unfiled.